

Yonatan Y. Jacobs, Esq. (NJ Bar No.: 022512010)
Erica A. Wolff, Esq. (Admitted *Pro Hac Vice*)
Michael Tremonte, Esq. (Admitted *Pro Hac Vice*)
SHER TREMONTE LLP
90 Broad Street, 23rd Floor
New York, New York 10004
(212) 202-2600
Attorneys for Sean Combs

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

LIZA GARDNER,

Plaintiff,

-against-

SEAN COMBS, AARON HALL,
UPTOWN RECORDS, MCA INC.,
UNIVERSAL MUSIC GROUP,
JOHN DOES 1-10 (names being fictitious and used to connote an unidentified person responsible for this occurrence), JANE DOES 1-10 (names being fictitious and used to connote an unidentified person responsible for this occurrence), ABC CORPORATIONS 1-10 (names being fictitious and used to connote unidentified entities responsible for this occurrence)

Defendants.

Case No. 2:24-CV-07729

**[PROPOSED] ORDER
CONCERNING CASE
MANAGEMENT**

WHEREAS, Plaintiff Liza Gardner (“Plaintiff”) has represented she intends to amend the Complaint in this action;

WHEREAS, Plaintiff believes her anticipated Amended Complaint may present a basis for a motion to remand this action to New Jersey State Court;

WHEREAS, Plaintiff and Defendants Sean Combs and Defendant UMG Recordings, Inc. (incorrectly sued herein as Defendants Uptown Records, MCA Inc. and Universal Music Group)

(“UMGR” and together with Mr. Combs, “Defendants”), agreed during the Court Conference held on September 10, 2024 to the following proposed case management and briefing schedule.

IT IS SO ORDERED that:

1. Plaintiff shall file her anticipated Amended Complaint by October 8, 2024;
2. Plaintiff shall file a motion for remand, if any, by October 8, 2024;
3. If Plaintiff moves to remand this action to New Jersey State Court on or before October 8, 2024, then:
 - a. Defendants shall file any opposition to such remand motion by November 13, 2024;
 - b. whereupon Plaintiff shall file any reply to such oppositions by December 3, 2024;
 - c. Defendants’ deadline to answer or move to dismiss the Amended Complaint shall be no later than 30 days after any such remand motion is decided and entered into the record.
4. If Plaintiff does not move to remand this action to New Jersey State Court, then:
 - a. Defendants’ shall answer or move to dismiss the Amended Complaint by November 13, 2024;
 - b. Whereupon, Plaintiff shall file any opposition to any such motions by December 27, 2024; and
 - c. Defendants shall file any reply to such oppositions by January 28, 2025.

Dated: _____ 2024

Hon. Leo M. Gordon